Social Media Policy
UC Davis Health System
Hospital Policies and Procedures

Policy ID: 1307

Revised 05/18/2016

PURPOSE

The purpose of this policy is to provide UC Davis Medical Center personnel with standards for participation in social media, such as online blogs, podcasts, webcasts, and social network sites. Except where it explicitly states otherwise, this policy applies only to health system-hosted social media.

SETTING
Medical Center

DEFINITION
Social media--incorporates various forms of electronic communication technologies that expand online communications into an interactive dialogue among organizations, communities and individuals. Social media allows for the creation and exchange of user-generated content to be shared and discussed over the Internet and **includes, but is not limited to, blogs, microblogs (like Twitter), online forums and chat rooms, other social networking sites (like Facebook, LinkedIn, YouTube, and Pinterest) and all other social media channels.**

POLICY
Existing Applicable Policies: University electronic communication policies, patient privacy policies, the UC Davis Principles of Community, the health system Code of Conduct, health system graphics standards (including wordmark usage), health system advertising policy, the health system's editorial style guide and copyright laws should be observed in all online activities. All the rules that apply to other health system communications apply here, specifically: respecting patients, customers and one another; protecting confidentiality, privacy and security; and safeguarding and proper use and handling of University and health system assets.

Endorsement: **Employees will not use the University name or their affiliation with the University to imply or do anything that might reasonably create the impression that the individual opinions they express represent the official views of or are supported by the health system.**

Accuracy: Employees must ensure that facts are authentic, accurate, fair and thorough. Employees should identify source material, including links, as appropriate.

Legal Restrictions: Employees may not post content or conduct any activity that fails to conform to any and all applicable state and federal laws, including copyright laws.

Proprietary Information: **Employees may not disclose any confidential or proprietary information of or about the health system, its affiliates, vendors or suppliers, on personal or health system hosted social media.** Proprietary information includes information in any form or media that is created by or on behalf of the health system in the course and scope of its business, regardless of whether that information is maintained or stored by the health system and others on the health system's behalf, such as company competitive information, financial information, intellectual property and business e-mail messages.

Patient Confidentiality: **Employees shall not use or disclose any patient identifiable information of any kind on any social media**, whether personal or hosted by the health system, without the express written permission of the patient. **Even if an individual is not identified by name within the information to be disclosed, if there is a reasonable basis to believe that the person could still be identified from that information, its use or disclosure could constitute a violation of the Health Insurance Portability and Accountability Act (HIPAA) and health system policy**. All patients referenced, quoted, described or otherwise identified (in a photograph, etc.) in any social media environment must complete a health system Patient Authorization for Training, Media, Public Communications, Fundraising or Marketing Purposes form that specifies consent for social media as one of the approved uses of PHI (see UCDMC Policy and Procedure 1426, Authorization and Consent to Photograph or Interview and 1302, Protected Health Information (PHI)/Personal Information (PI) Notification).

Interaction with Patients: **Health-care providers are discouraged from "friending" or following current or past patients on personal networking sites, such as Facebook, Twitter, Instagram and Snapchat. Staff in patient care roles generally should not initiate or accept friend requests**. Social media (even those with "private" or "direct" message features) shall not be used to discuss a patient's health information. Patients who attempt to use social media to communicate with their provider or care team about their health status should be directed to an approved, protected or encrypted medium, such as MyChart or a phone call to a provider's office. No protected health information should be repeated, divulged or discussed at anytime within any social media, whether personal or hosted by the health system channel.

<u>University Generated Social Media</u>: When authorized, employees communicating on behalf of the health system will review posts and comments regularly – ideally at least once daily – to ensure any issues or concerns are addressed in a timely manner. Authorized employees will delete comments that personally attack others or are inappropriate, inflammatory, offensive, profane, threatening, violent, obscene or sexually explicit. Complaints will be acknowledged and handled appropriately and in a timely manner, not deleted without consulting Public Affairs and Marketing. Mistakes will be acknowledged and corrected promptly. Good judgment and accuracy are imperative in all online communications. Errors and omissions reflect poorly on the organization and may result in liability for employees and the health system. All official health system social media channels must contain a link to the health system's social media participation guidelines: http://healthsystem.ucdavis.edu/welcome/socialmedia/index.html. The unit/department/person that initiates a social media site is responsible for its maintenance and day-to-day management and monitoring.

<u>Health System-Hosted Blogs</u>: Employees must obtain approval from department managers and Public Affairs and Marketing before setting up a health system-hosted blog or other social media site. Health system-hosted blogs must focus on subjects related to the health system's missions of research, education, patient care and public service. Bloggers must be related to UC Davis as faculty, staff, graduate students, postdoctoral fellows or students and identify themselves and their affiliation prominently on the blog's homepage. Bloggers should not be anonymous and should follow the spirit of the UC Davis Principles of Community. Bloggers will disclose conflicts of interest. Blogs must contain a link to the health system's social media participation guidelines: http://healthsystem.ucdavis.edu/welcome/socialmedia/index.html. The unit/department/person that initiates the request for a blog is responsible for its maintenance and day-to-day management and monitoring. If a blog is no longer being updated, after six months Public Affairs and Marketing has the right (but not the obligation) to remove it.

<u>Use of the University Name</u>: Employees may not use the University name, seals or trademarks when establishing websites, blogs, social media representation such as a Twitter account or Facebook group or domain names unless authorized to do so by the University. See UC Davis Policy and Procedure Manual (PPM) 310-65, for information about the use of University name, seal and other trademarks for commercial use, noncommercial use by organizations and groups and by individual employees. UC Davis Health System does not endorse people, products, services or organizations. (See UCDMC Policy and Procedure 1318, Advertising and 1302, Protected Health Information (PHI)/Personal Information (PI) Notification).

<u>Consultations with Public Affairs and Marketing</u>: Employees may contact the health system Public Affairs and Marketing department for assistance in identifying appropriate content for social media

outreach, including proper use of health system logos and branding. Health system departments/units shall be responsible for the regular review and updating of materials published in social media. If an employee is approached by the media regarding a social media site, the employee must get authorization from Public Affairs and Marketing prior to responding or speaking as a health system spokesperson. The Public Affairs and Marketing department, along with the Compliance and Legal Affairs departments, maintain the right (but are not obligated) to ensure sites meet all relevant policies.

Communication Tools: Additional guidance and information regarding social media and its usage can be found on the Insider under "Communication Tools."

SANCTIONS
Violations of health system polices or state and federal privacy laws may result in disciplinary actions up to and including dismissal and the risk of civil and criminal fines under state and federal laws.

Sent to the following for review:
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